

**To:** Lombardo, Ginny[Lombardo.Ginny@epa.gov]  
**Cc:** Stanley, Elaine[stanley.elainet@epa.gov]  
**From:** Wolf, Steven NAE  
**Sent:** Mon 9/19/2016 11:39:03 AM  
**Subject:** RE: Aerovox Phase III Remedial Action Plan (RAP)

Hi Ginny, I agree that pump and treat would be the most effective at protecting the harbor, given that there is, at present, no technology identified to remove the source. I think Dan Groher (who helped with the comments) was noting the ineffectiveness of pump and treat as a permanent solution given that it would have such a long operational horizon. If we end up with a discussion on the technical concerns, it would be good to pull Dan in - Steve

-----Original Message-----

From: Lombardo, Ginny [mailto:Lombardo.Ginny@epa.gov]  
Sent: Monday, September 19, 2016 7:19 AM  
To: Wolf, Steven NAE <Steven.Wolf@usace.army.mil>  
Cc: Stanley, Elaine <stanley.elainet@epa.gov>  
Subject: [EXTERNAL] RE: Aerovox Phase III Remedial Action Plan (RAP)

Steve-

Your General Comment 2 and Mike's comment 9 implied OU3B-2 or OU3B-3 may not be effective. You noted issues with long-term pump and treat and Mike noted issues with pumping to maintain stable system. However, this is the type of remedy EPA believes would be the most effective at protecting the harbor. At some point, I would like to discuss the technical concerns with you. Let's wait to see MassDEP's comments on the Phase III. Thanks.

Ginny Lombardo, Chief  
Remediation & Restoration II Branch  
U.S. EPA Region 1 - New England  
(617)918-1754

-----Original Message-----

From: Wolf, Steven NAE [mailto:Steven.Wolf@usace.army.mil]  
Sent: Friday, September 16, 2016 3:17 PM  
To: Lombardo, Ginny <Lombardo.Ginny@epa.gov>  
Cc: Stanley, Elaine <stanley.elainet@epa.gov>  
Subject: RE: Aerovox Phase III Remedial Action Plan (RAP)

Hi Ginny - That's a possible, but not a certain alternative. As Dan Groher noted in our comments, PRBs don't always work as expected. The scenario in the alternative below may drive site overburden groundwater deeper into the bedrock system (with later discharge to the harbor) rather than directing flow to the northern and southern boundaries through the PRBs. Modeling this scenario could provide some insight, but it would not be definitive. One thing Dan and I discussed but didn't state explicitly - this is a complex site with multiple OUs, and it may not be possible to come up with a permanent solution for all of the OUs at this time. The immediate primary goal is to isolate the contaminant source from exposure on site and shut off its influence on the surrounding areas. I think the only certain way to do that at this point is a low permeability barrier around most of the site (with the specification of sheet pile along the river in light of planned harbor excavation) and with pump and treatment of the site groundwater to limit offsite migration. This is an open ended, energy intensive approach, but it could be re-evaluated after several years in light of a better understanding of the groundwater flow system, a better understanding of long term groundwater concentrations (that could allow alternative treatment technologies), and potential new technologies for remediating DNAPL in the bedrock. I'm around for a while this afternoon if you would like to discuss this more - Steve

Steven Wolf

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-----Original Message-----

From: Lombardo, Ginny [mailto:Lombardo.Ginny@epa.gov]  
Sent: Friday, September 16, 2016 2:47 PM  
To: Wolf, Steven NAE <Steven.Wolf@usace.army.mil>  
Cc: Stanley, Elaine <stanley.elainet@epa.gov>  
Subject: [EXTERNAL] RE: Aerovox Phase III Remedial Action Plan (RAP)

Steve-

What do you think of this comment from Mike M:

General: It seems that a possible alternative that wasn't considered was a low permeability barrier along the eastern boundary with PRBs located on the northern and southern boundaries of the site. The costs and implementation would be similar, but it would also provide containment for the soils component and may also address the hydraulic control needed to maintain equilibrium. To ignore containment of soils along the eastern side of the site is to discount the impact of any effort to reduce contamination on the Harbor side of the boundary.

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-----Original Message-----

From: Wolf, Steven NAE [mailto:Steven.Wolf@usace.army.mil]  
Sent: Wednesday, September 14, 2016 10:56 AM  
To: Lombardo, Ginny <Lombardo.Ginny@epa.gov>; Morris, Mike (Bourne) <Mike.Morris@jacobs.com>; Ford, Robert <Ford.Robert@epa.gov>; Catri, Cindy <Catri.Cynthia@epa.gov>; Stanley, Elaine <stanley.elainet@epa.gov>  
Cc: Lederer, Dave <Lederer.Dave@epa.gov>; Barczynski, Hoshaiiah <barczynski.hoshaiah@epa.gov>; Iorio, Maryellen NAE <Maryellen.Iorio@usace.army.mil>; Fox, Steve (New Bedford) <Steve.Fox@jacobs.com>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>; Groher, Daniel M NAE <Daniel.M.Groher@usace.army.mil>  
Subject: RE: Aerovox Phase III Remedial Action Plan (RAP)

Hi Ginny, attached please find comments on the Phase III Remedial Action Plan prepared by Dan Groher and myself. Also to be noted, we are in agreement with the comments supplied by Jacobs. Let us know if you would like to discuss these - Steve

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-----Original Message-----

From: Lombardo, Ginny [mailto:Lombardo.Ginny@epa.gov]  
Sent: Wednesday, September 07, 2016 11:30 AM  
To: Wolf, Steven NAE <Steven.Wolf@usace.army.mil>; Morris, Mike (Bourne) <Mike.Morris@jacobs.com>; Ford, Robert <Ford.Robert@epa.gov>; Catri, Cindy <Catri.Cynthia@epa.gov>; Stanley, Elaine <stanley.elainet@epa.gov>  
Cc: Lederer, Dave <Lederer.Dave@epa.gov>; Barczynski, Hoshaiiah <barczynski.hoshaiah@epa.gov>; Iorio, Maryellen NAE <Maryellen.Iorio@usace.army.mil>; Fox, Steve (New Bedford) <Steve.Fox@jacobs.com>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>  
Subject: [EXTERNAL] RE: Aerovox Phase III Remedial Action Plan (RAP)

I have extended our comments to DEP timeline by a few days so please get me comment by COB September 14th or earlier.

From: Lombardo, Ginny  
Sent: Wednesday, August 31, 2016 10:21 AM  
To: Wolf, Steven NAE <Steven.Wolf@usace.army.mil>; Morris, Mike (Bourne) <Mike.Morris@jacobs.com>; Ford, Robert <Ford.Robert@epa.gov>; Catri, Cindy <Catri.Cynthia@epa.gov>; Stanley, Elaine <stanley.elainet@epa.gov>  
Cc: Lederer, Dave <Lederer.Dave@epa.gov>; Barczynski, Hoshaiiah <barczynski.hoshaiah@epa.gov>; 'Iorio, Maryellen NAE' <Maryellen.Iorio@usace.army.mil>; Fox, Steve (New Bedford) <Steve.Fox@jacobs.com>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>  
Subject: FW: Aerovox Phase III Remedial Action Plan (RAP)

Steve, Mike and Robert-

EPA intends to transmit comment on the Aerovox Phase III RAP to MassDEP by COB September 9, 2016. Please review and get me comments on the document by COB September 8, 2016 so that I can consolidate comments to get to the DEP on the 9th. Our comments should be limited to matters related to the impact of the alternatives evaluated and the elements of the selected alternative on the Superfund cleanup and/or impacts to the harbor - i.e., generally our comments should relate to concerns or questions related to the OU3 remedial alternatives and OU3 selected alternative. I do not want to send DEP voluminous comments so please attempt to focus comments on significant concerns and issues. Thanks.

Kim Tisa may be issuing TSCA related comments on the Phase III directly to AVX.

Ginny Lombardo, Chief

Remediation & Restoration II Branch

U.S. EPA Region 1 - New England

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From: Stanley, Elaine  
Sent: Tuesday, August 23, 2016 10:11 AM  
To: 'Wolf, Steven NAE' <Steven.Wolf@usace.army.mil <mailto:Steven.Wolf@usace.army.mil> >; 'Morris, Mike (Bourne)' <Mike.Morris@jacobs.com <mailto:Mike.Morris@jacobs.com> >; Ford, Robert <Ford.Robert@epa.gov <mailto:Ford.Robert@epa.gov> >; Catri, Cindy <Catri.Cynthia@epa.gov <mailto:Catri.Cynthia@epa.gov> >; Lederer, Dave <Lederer.Dave@epa.gov <mailto:Lederer.Dave@epa.gov> >; Barczynski, Hoshaiiah <barczynski.hoshaiah@epa.gov <mailto:barczynski.hoshaiah@epa.gov> >; Dickerson, Dave <dickerson.dave@epa.gov <mailto:dickerson.dave@epa.gov> >  
Cc: Iorio, Maryellen NAE <Maryellen.Iorio@usace.army.mil <mailto:Maryellen.Iorio@usace.army.mil> >; Gouveia, Mark <Mark.Gouveia@jacobs.com <mailto:Mark.Gouveia@jacobs.com> >; Fox, Steve (New Bedford) <Steve.Fox@jacobs.com <mailto:Steve.Fox@jacobs.com> >; 'Hardesty, Al' <Al.Hardesty@jacobs.com <mailto:Al.Hardesty@jacobs.com> >  
Subject: Aerovox Phase III Remedial Action Plan (RAP)

FYI - Please find below the MassDEP website link to download the Former Aerovox site 21E Phase III RAP which constitutes AVX's FS/Proposed Plan. It can be found under the date 08/22/16 and is 17 mb.

BlockedBlockedBlocked<http://public.dep.state.ma.us/fileviewer/Rtn.aspx?rtn=4-0000601>

Please let me know if you have trouble downloading, thanks.

Elaine

Elaine Stanley

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